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19 CONTRA COSTA COUNTY

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY, MICHAEL SLOAN;
23 ALYN D. GOLDSMITH; DEBORAH ELITE;
24 BILLIE JO WILSON ELKIN; SUSANNE
BEADLE; and ALICE GROTHMANN;

25 Plaintiffs,

26 v.

27 CONTRA COSTA COUNTY,

28 Defendant.

CASE NO. C 12-00944 JST

**STIPULATION THAT NO RESPONSE TO
THIRD AMENDED COMPLAINT FOR
SETTLEMENT PURPOSES IS
NECESSARY AND ALTERNATIVELY
~~AND ADDITIONALLY AN EXTENSION~~
~~OF TIME TO RESPOND TO THIRD~~
~~AMENDED COMPLAINT~~**

Judge: Hon. Hon. Jon S. Tigar

1 1. Plaintiffs Retiree Support Group of Contra Costa County ("Plaintiff RSG"),
 2 Plaintiffs MICHAEL SLOAN; ALYN D. GOLDSMITH; DEBORAH ELITE; BILLIE JO
 3 WILSON ELKIN; SUSANNE BEADLE; and ALICE GROTHMANN (collectively "Plaintiff
 4 Class Representatives") and Defendant Contra Costa County ("Defendant County") have entered
 5 into a comprehensive written settlement agreement ("Agreement") which the Court preliminarily
 6 approved on June 14, 2016 (ECF 169). The terms of the Agreement required Plaintiff RSG to file
 7 a Third Amended Complaint alleging a class action and seeking damages. Plaintiff RSG and
 8 Plaintiff Class Representatives filed their Third Amended Complaint on June 16, 2016.

9 2. The Parties agree that no pleading responding to the Third Amended Complaint is
 10 necessary at this time since under the terms of the Agreement provide that the Third Amended
 11 Complaint was filed solely for settlement purposes, and will be withdrawn and have no force and
 12 effect, if the settlement is not fully implemented.

13 3. ~~Alternatively and additionally, the Parties agree and stipulate that Defendant~~
 14 ~~County's time for response is extended to and including twenty (20) days after the Fairness~~
 15 ~~Hearing to finally approve the Agreement on October 25, 2016.~~

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1 IT IS SO STIPULATED.

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3 DATED: July 6, 2016

KELLER ROHRBACK, L.L.P.

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5 By: /s/ Jeffrey Lewis

6 JEFFREY LEWIS

7 Attorneys for Plaintiffs

8 RETIREE SUPPORT GROUP OF CONTRA

9 COSTA COUNTY, MICHAEL SLOAN,

DEBORAH ELITE, SUSANNE BEADLE,

BILLIE JOE WILSON ELKIN, ALYN

GOLDSMITH, AND ALICE GROTHMANN

10 DATED: July 5, 2016

HANSON BRIDGETT LLP

11
12 By: /s/ Raymond F. Lynch

13 RAYMOND F. LYNCH

14 LAWRENCE M. CIRELLI

15 STEPHEN B. PECK

16 MATTHEW J. PECK

17 Attorneys for Defendant

18 CONTRA COSTA COUNTY

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IT IS SO ORDERED.

Dated: July 11, 2016



HONORABLE JOHN S. TIGAR

United States District Court Judge

SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the filing of this document—hereby attests that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

By: /s/ Raymond L Lynch
Raymond L. Lynch